

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN**

TRACY COLE et al.,

Plaintiffs.

v.

Case No. 20 CV 01660

CITY OF WAUWATOSA et al.,

Defendants.

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**PLAINTIFF'S DISCOVERY PLAN PROPOSAL**

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The Plaintiffs as instructed by the court on October 1, 2021 submit the following discovery plan proposal as it relates to the number of interrogatories, depositions, and requests for admissions.

**I. PROPOSED DISCOVERY PLAN**

A). Rule 26(a)(1) disclosures.

The parties will make available by October 8, 2021 the information required by Federal Rule of Civil Procedure 26(a)(1).

B). Interrogatories

Plaintiffs propose that parties may serve not more than fifteen (15) written interrogatories on any other party.

C). Depositions.

Plaintiff's propose 140 more hours of deposition time.

D). Request for Admissions

Plaintiff's propose thirty-five written requests for admissions to be served per party.

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